

# **Exhibit 13**

**AFFIDAVIT and DECLARATION OF TIMOTHY JOHN RUNKLE**

TIMOTHY JOHN RUNKLE, being duly sworn, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of Elizabethtown, Pennsylvania, in Lancaster County.
2. I voted in the 2016 general election in my district: District Number 1601 and Voting District Elizabethtown Borough 1-W.
3. I have a B.S. in geology from Millersville University and work as a geologist.
4. I submit this affidavit/declaration to explain the hurdles I have faced in trying to seek a recount of votes in Lancaster County.
5. On Monday, November 28, 2016, I personally went to the Lancaster County Board of Elections office in Lancaster, PA with three notarized affidavits, including my own, from voters in my precinct, along with the required supporting documents to request a recount. I arrived at the office before it first opened in the morning.
6. I met with Randall O. Wenger, Chief Clerk, Lancaster County Board of Elections, shortly after the office first opened at 8:30 a.m. on November 28, 2016. I gave Mr. Wenger the three affidavits with supporting documents and he time stamped each affidavit at 8:37 a.m.. Attached as Exhibit A is the first page of each affidavit with the time stamp. Mr. Wenger told me that the Board of Elections would review the petitions.
7. When we met, Mr. Wenger told me that the Board had not yet certified the final voting results. He explained that he had just come from delivering the results to the Board members that morning to be reviewed and signed by them. Based on what he told me, I believed the computation of the returns was not yet complete for Lancaster County when I filed the request for a recount in my district.

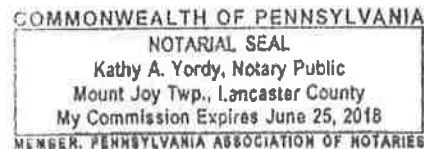
8. On Friday December 2, 2106, I received a letter, dated November 30, 2016, from Mr. Wenger. The letter stated that the Board met on Wednesday November 30, 2016 and rejected my petition for a recount because it had completed its computation on November 23, 2016. The letter further stated that any petition for recount would need to be filed with the Lancaster County Court of Common Pleas. Attached as Exhibit B is the November 30, 2016 Wenger letter.

9. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election. I would like a manual recount of every paper ballot and a forensic examination of the electronic voting systems in Pennsylvania done to make sure the vote had integrity and every vote counted.

Dated: December 4, 2016  
211 N Poplar St, ELIZABETHTOWN Pennsylvania

  
TIMOTHY JOHN RUNKLE

Sworn to and subscribed before me  
this 4th day of December, 2016.



  
NOTARY PUBLIC

## **Exhibit A**

EX. A

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF LANCASTER

2016 NOV 23 AM 8 36  
PETITION TO RECOUNT AND/OR RECANVASS  
AND AFFIDAVIT OF [your name] Alisha Runkle

TO THE LANCASTER COUNTY BOARD OF ELECTIONS, [name of  
county] LANCASTER, PENNSYLVANIA:

Alisha Runkle verifies, deposes and says the following under penalty of  
perjury:

1. My name is Alisha Runkle. I am a registered voter in City, Borough  
Township of ELIZABETHTOWN, Precinct [insert number] ELIZABETHTOWN BORO 1ST WARD (1601)  
LANCASTER County, Pennsylvania. I voted in this district in the election on  
November 8, 2016. I live at [insert complete street address]  
211 N Poplar St. ELIZABETHTOWN, LANCASTER County, Pennsylvania.

2. Pursuant to 25 P.S. § 3154, I request a recount and recanvass of the vote for  
President of the United States and for United States Senate in the November 8, 2016 election in  
this district.

3. I believe that an error, although not apparent on the face of the returns, has been  
committed in the vote in this district. I also believe there is a discrepancy in the returns of this  
district.

4. My belief is based, in part, on the attached Affidavit of Alex Halderman, which  
raises grave concerns about the integrity of optical scan voting machines used in this district.

See Ex. A (attached).



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF LANCASTER

PETITION TO RECOUNT AND/OR RECANVASS  
AND AFFIDAVIT OF [your name] Timothy John Runkle

TO THE LANCASTER COUNTY BOARD OF ELECTIONS, [name of  
county] LANCASTER, PENNSYLVANIA:

Timothy John Runkle, verifies, deposes and says the following under penalty of  
perjury:

1. My name is Timothy John Runkle. I am a registered voter in City Borough  
Township of ELIZABETHTOWN, Precinct [insert number] ELIZABETHTOWN BORO - 1<sup>ST</sup> WARD  
LANCASTER County, Pennsylvania. I voted in this district in the election on  
November 8, 2016. I live at [insert complete street address]  
211 N Poplar St., ELIZABETHTOWN, LANCASTER County, Pennsylvania.

2. Pursuant to 25 P.S. § 3154, I request a recount and recanvass of the vote for  
President of the United States and for United States Senate in the November 8, 2016 election in  
this district.

3. I believe that an error, although not apparent on the face of the returns, has been  
committed in the vote in this district. I also believe there is a discrepancy in the returns of this  
district.

4. My belief is based, in part, on the attached Affidavit of Alex Halderman, which  
raises grave concerns about the integrity of optical scan voting machines used in this district.  
See Ex. A (attached).

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF LANCASTER

PETITION TO RECOUNT AND/OR RECANVASS  
AND AFFIDAVIT OF [your name] Sherrie Larden

TO THE LANCASTER COUNTY BOARD OF ELECTIONS, [name of  
county] LANCASTER, PENNSYLVANIA:

Sherrie Larden, verifies, deposes and says the following under penalty of  
perjury:

1. My name is Sherrie Larden. I am a registered voter in City Borough  
Township of ELIZABETHTOWN, Precinct [insert number] ELIZABETHTOWN BORO 1ST WARD (160  
LANCASTER County, Pennsylvania. I voted in this district in the election on  
November 8, 2016. I live at [insert complete street address]  
240 E. Park St. Apt. 102 Elizabethtown, PA, LANCASTER County, Pennsylvania.
2. Pursuant to 25 P.S. § 3154, I request a recount and recanvass of the vote for  
President of the United States and for United States Senate in the November 8, 2016 election in  
this district.
3. I believe that an error, although not apparent on the face of the returns, has been  
committed in the vote in this district. I also believe there is a discrepancy in the returns of this  
district.
4. My belief is based, in part, on the attached Affidavit of Alex Halderman, which  
raises grave concerns about the integrity of optical scan voting machines used in this district.  
*See Ex. A (attached).*

2016 NOV 28 PM 8 37

## **Exhibit B**



EX. B



Board of Elections and Registration Commission

150 North Queen Street

Suite 117

Lancaster, PA 17603-3562

Phone: 717-299-8293

Fax: 717-209-3076

[www.co.lancaster.pa.us/elections](http://www.co.lancaster.pa.us/elections)

Joshua G. Parsons, Chairman  
Dennis P. Stuckey, Vice-Chairman  
Craig E. Lehman

November 30, 2016

Randall O. Wenger  
Chief Clerk  
Chief Registrar

Timothy John Runkle  
211 N. Poplar St.  
Elizabethtown, PA 17022

Dear Timothy:

The Lancaster County Board of Elections met on Wednesday, November 30 and has rejected your petition for recount based upon the following section of the PA Election Code.

*"Title 25 P.S. 3154*

(e) Provision for Recount or Recanvass of Vote.—Whenever it shall appear that there is a discrepancy in the returns of any election district, or, upon petition of three voters of any district, verified by affidavit, that an error, although not apparent on the face of the returns, has been committed therein, or of its own motion or under subsection (g), the county board shall at **any time prior to the completion of the computation of all of the returns** for the county, summon the election officers of the district, and said officers, in the presence of said board, shall conduct a recount or recanvass of all ballots cast...."

The Lancaster County Board of Elections completed its computation and first signing on Wednesday, November 23. As such, any petition for recount after that date would need to be filed with the Lancaster County Court of Common Pleas, as confirmed by the Pennsylvania Department of State.

Best regards,

Randall O. Wenger  
Chief Clerk, Lancaster County Board of Elections.

